

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

_____)	
CONTENTGUARD HOLDINGS, INC.,)	
)	
Plaintiff,)	
)	
v.)	
)	
AMAZON.COM, INC.; APPLE INC.;)	
BLACKBERRY LIMITED (FKA RESEARCH)	
IN MOTION LIMITED) AND BLACKBERRY)	No. 2:13-cv-01112 (JRG)
CORPORATION (FKA RESEARCH IN)	
MOTION CORPORATION); HTC)	JURY TRIAL DEMANDED
CORPORATION AND HTC AMERICA, INC.;)	
HUAWEI TECHNOLOGIES CO., LTD. AND)	
HUAWEI DEVICE USA, INC.; MOTOROLA)	
MOBILITY LLC; SAMSUNG ELECTRONICS)	
CO., LTD., SAMSUNG ELECTRONICS)	
AMERICA, INC., and SAMSUNG)	
TELECOMMUNICATIONS AMERICA, LLC,)	
)	
Defendants.)	
_____)	

**FOURTH NOTICE OF COMPLIANCE WITH THIRD-PARTY
PRODUCTION PROVISIONS BY DEFENDANT AMAZON.COM, INC.**

Pursuant to Paragraph 12 of the Amended Protective Order, Defendant Amazon.com, Inc. files this notice that it produced third-party confidential information and verifies as follows:

1. Hachette Book Group, Inc.: Amazon notified Hachette of its intent to produce confidential documents by letter dated October 7, 2014, sent via FedEx. The letter informed Hachette of the specific items to be produced and included the Amended Protective Order. On October 10, 2014, counsel for Hachette contacted counsel for Amazon. Hachette did not object to the production of the confidential documents under the confidentiality designation “Outside Attorneys’ Eyes Only” with a few redactions of irrelevant commercially sensitive information.

2. HarperCollins Publishers: Amazon notified HarperCollins of its intent to produce confidential documents by letter dated October 7, 2014, sent via FedEx. The letter informed HarperCollins of the specific items to be produced and included the Amended Protective Order. On October 10, 2014, counsel for HarperCollins contacted counsel for Amazon. HarperCollins did not object to the production of the confidential documents under the confidentiality designation “Outside Attorneys’ Eyes Only” with a few redactions of irrelevant commercially sensitive information.

3. Holtzbrinck Publishers, LLC: Amazon notified Holtzbrinck of its intent to produce confidential documents by letter dated October 7, 2014, sent via FedEx. The letter informed Holtzbrinck of the specific items to be produced and included the Amended Protective Order. On October 10, 2014, counsel for Holtzbrinck contacted counsel for Amazon. Holtzbrinck did not object to the production of the confidential documents under the confidentiality designation “Outside Attorneys’ Eyes Only” with a few redactions of irrelevant commercially sensitive information.

4. Penguin Random House LLC: Amazon notified Penguin Random House of its intent to produce confidential documents by letter dated October 7, 2014, sent via FedEx. The letter informed Penguin Random House of the specific items to be produced and included the Amended Protective Order. On October 10, 2014, counsel for Penguin Random House contacted counsel for Amazon. Penguin Random House did not object to the production of the confidential documents under the confidentiality designation “Outside Attorneys’ Eyes Only” with a few redactions of irrelevant commercially sensitive information.

5. Simon & Schuster, Inc.: Amazon notified Simon & Schuster of its intent to produce confidential documents by letter dated October 7, 2014, sent via FedEx. The letter informed Simon & Schuster of the specific items to be produced and included the Amended Protective Order. On October 10, 2014, counsel for Simon & Schuster contacted counsel for Amazon. Simon & Schuster did not object to the production of the confidential documents under the

confidentiality designation “Outside Attorneys’ Eyes Only” with a few redactions of irrelevant commercially sensitive information.

Respectfully submitted,

/s/ Jennifer H. Doan

Jennifer H. Doan
Texas Bar No. 08809050
Joshua R. Thane
Texas Bar No. 24060713
HALTOM & DOAN
6500 Summerhill Road
Crown Executive Center, Suite 100
Texarkana, TX 75505
Telephone: (903) 255-1000
Facsimile: (903) 255-0800
Email: jdoan@haltomdoan.com
Email: jthane@haltomdoan.com

Glen E. Summers (admitted pro hac vice)
Alison G. Wheeler (admitted pro hac vice)
Katherine Hacker (admitted pro hac vice)
BARTLIT BECK HERMAN PALENCHAR
& SCOTT LLP
1899 Wynkoop Street, 8th Floor
Denver, CO 80202
Telephone: (303) 592-3100
Facsimile: (303) 592-3140
Email: glen.summers@bartlit-beck.com
Email: alison.wheeler@bartlit-beck.com
Email: kat.hacker@bartlit-beck.com

Abby Mollen (admitted pro hac vice)
BARTLIT BECK HERMAN PALENCHAR
& SCOTT LLP
54 West Hubbard Street, #300
Chicago, IL 60654
Telephone: (312) 494-4400
Facsimile: (312) 494-4440
Email: abby.mollen@bartlit-beck.com

**COUNSEL FOR DEFENDANT
AMAZON.COM, INC.**

CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing document was filed electronically in compliance with Local Rule CV-5(a). As such, this document was served on all counsel who have consented to electronic service on November 5, 2014. See Local Rule CV-5(a)(3)(A).

/s/ Jennifer H. Doan

Jennifer H. Doan